

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION

Jane Doe(a fictitious name),,

Plaintiff,

v.

UNUM LIFE INSURANCE COMPANY OF  
AMERICA and UNUM GROUP CORP.,

Defendants.

Civil Action No.3:22-cv-00212

PLAINTIFF'S MOTION TO file document under seal Pending the Court's Order on Plaintiff's Motion for Permission to Proceed Under a Pseudonym and for a Protective Order [Doc 2-0], Plaintiff requests permission to file Exhibit A to the Memorandum in Support of Plaintiff's Motion for Permission to Proceed Under a Pseudonym and for a Protective Order [Doc. 3-0] under seal in order to protect her identity.

Plaintiff will file the full document under seal with the Court, in accordance with the requested Protective Order in this case. For the reasons expressed in Plaintiff's Motion for Permission to Proceed Under a Pseudonym and for a Protective Order and those articulated below, Plaintiff asks the Court's permission to file this document under seal.

1. This case arises from Plaintiff's claim for long term disability insurance benefits.
2. Plaintiff suffered a closed head injury as a result of a car accident in 2018, and has significant physical and cognitive restrictions and limitations as a result of her injury.
3. Plaintiff practiced law as a shareholder with Baker Donelson in Knoxville, Tennessee and specialized in environmental law prior to her injury, and returned to practice part-time after her injury.

4. Fed. R. Civ. Proc. 26(c) authorizes the Court to “make any order which justice requires to protect the party or person from annoyance, embarrassment, oppression, or undue burden or expense” upon motion of a party.
5. Courts may “excuse plaintiffs from identifying themselves in certain circumstances” where “a plaintiff’s privacy interests substantially outweigh the presumption of open judicial proceedings.” *Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004).
6. Plaintiff Jane Doe fears significant embarrassment and damage to her professional reputation with colleagues and judges as well as the inability to obtain future employment in the legal field should she recover enough to work again in the future.
7. Because disclosure of her true identity would subject Jane Doe to embarrassment, and there is a strong possibility that litigating this case under her real name would impair her reputation and effectiveness with her peers, she should be allowed to file this document under seal.
8. The Defendants in this case, Unum Life Insurance Co. of North America and Unum Group, are aware of the Plaintiff’s true identity, because they can identify her claim through her claim number, identified in the complaint. Allowing her to file this document under seal will not prejudice them.

For the reasons articulated above as well as those contained in the Memorandum of Law filed in support of the Motion to Proceed under Pseudonym and for a Protective Order [Doc. 3-0], Plaintiff Jane Doe respectfully requests this Court allow the document to be filed under seal in order to protect her privacy

BY:

/s/ Hudson Ellis

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of this the foregoing document has been served upon all parties of interest in this case, and filing it with the Court's electronic case filing system:

Unum Group  
By and Through Corporation Service Company  
2908 Poston Ave.  
Nashville, TN 374203

Unum Life Ins. Co. of America  
By and Through the Department of Commerce and Insurance  
500 James Robertson Parkway  
Nashville, TN 37243

This the 10th day of June, 2022

/s/ Hudson T. Ellis  
Hudson T. Ellis